

REMARKS

Applicant respectfully requests consideration and allowance of the elected claims. Claims 1-88 were originally filed. Claims 1-52 have been previously canceled as being directed to non-elected claims. Claim 86 has been previously canceled without prejudice.

Independent claims 53, 74, 87, and 88 are amended, as is dependent claim 57. Thus, claims 53-85 and 87-88 remain pending.

Applicant thanks the Examiner for the detailed analysis presented in the Office Action of June 3, 2005.

Claims Rejected under 35 U.S.C. § 103

Claims 53-63, 65-70, 72-80, 82-85, and 87-88 are rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 5,214,583 to Miike et al. (hereinafter, "Miike") in view of U.S. Patent No. 5,987,403 to Sugimura (hereinafter, "Sugimura"). Claims 64, 71, and 81 are rejected under 35 U.S.C. § 103 as being unpatentable over Miike in view of Sugimura in further view of U.S. Patent No. 5,974,413 to Beauregard et al. Applicant respectfully traverses the rejection.

Applicant has amended independent claims 53, 74, 87, and 88, as described below. As a preliminary matter, applicant does not separately address the patentability of each remaining dependent claim in detail. However, applicant's decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that applicant concurs with the Examiner's conclusion that these dependent claims are not patentable over the disclosure in the cited references. Similarly, applicant's decision not to discuss

1 differences between the prior art and every claim element, or every comment
2 made by the Examiner, should not be considered as an admission that applicant
3 concurs with the Examiner's interpretation and assertions regarding those claims.
4 Indeed, applicant believes that all of the dependent claims patentably distinguish
5 over the references cited. Moreover, a specific traverse of the rejection of each
6 dependent claim is not required, since dependent claims are patentable for at least
7 the same reasons as the independent claims from which the dependent claims
8 ultimately depend.

9 Claim 53 as amended, as representative of the other independent claims
10 rejected over Miike in view of Sugimura, recites:

11
12 53. (Currently Amended) A language input user interface
13 comprising:

14 a line-based entry area;
15 an input text displayed within the line-based entry area; and
16 an output text, converted from the input text, wherein the
17 output text replaces the input text from which the output text was
18 converted as each portion of the input text is converted and is
19 displayed together with unconverted input text within the line-based
20 entry area in at least one continuous string of text.

21
22 Respectfully, neither of the references, alone or in combination, teaches or
23 suggests what is recited by claims 53, 74, 87, and 88 for at least two reasons.

24 First, neither Miike nor Sugimura show output text presented in a
25 continuous string of text with unconverted input text. In Miike, FIGURES 7-17

1 illustrate an interface where nontranslated text appears in a first field on one side
2 of a display, whereas translated text appears in a separate, second field on an
3 opposite side of the display. Further, in FIGURES 6, 7, and 17 of Sugimura cited
4 in the Office Action, output text similarly is not presented in a continuous string of
5 text with unconverted text input. In FIGURES 6 and 17, the unconverted text is
6 presented on a separate line from the converted text. In FIGURE 7, as in the case
7 of FIGURES 7-17 of Miike, converted text appears in a field on an opposite side
8 of a display from the unconverted text. Thus, applicant submits that neither
9 reference, alone or in combination, teaches or suggests what is recited in Claim 53.

10 Second, neither Miike nor Sugimura show output text replacing the input
11 text as each portion of the input text is converted. In fact, both Miike and
12 Sugimura are directed to presenting the unconverted text and the converted text
13 side by side for comparison, a point that is emphasized by the display of the
14 unconverted text and converted text in different parts of the display. In FIGURES
15 7 and 17 of Miike, the unconverted text is displayed in a field on a left column of
16 the display while the converted text is displayed in a right column of the display.
17 Similarly, in FIGURES 6, 7, and 17 of Sugimura, the unconverted text appears on
18 a first line or in a field on a left side of the display, while the converted text
19 appears on a separate, second line or in a field on a right side of the display. The
20 converted and unconverted text *both* are correlated and displayed, and in neither
21 reference does the unconverted text replace the converted text on the display.

22 In fact, it is an object of both the cited references to maintain the
23 unconverted and converted text, rather than replace the unconverted text. The
24 interface of Miike, as shown in FIGURE 3, includes an original display region and
25 a translation display region in which neither text replaces the other. Moreover,

1 studying the flow diagram of FIGURE 4 of Miike, original text is displayed at S9,
2 while translated text is displayed at S7, and there is no provision for translated text
3 to replace the original, nontranslated text. It is noted that, while the interface of
4 FIGURE 3 also illustrates an edit region, the edit region includes only translated
5 text. Thus, as summarized by Miike:

6 "Therefore, the operator can interactively obtain a translated text
7 while inputting original text and performing edit processing of the
8 *corresponding translated text.*"

8 (See Miike, Column 5, Lines 52-55; emphasis added).

9 In Sugimura, both the figures and the text make clear that it is an object of
10 Sugimura *not* to replace original, nontranslated text with translated text, but to
11 maintain the original and translated text in pairs to illustrate the correspondence of
12 the original words to the translated words:

13 "The above object can be achieved by a document conversion
14 apparatus for converting source data into target data which includes
15 a source text memory unit for storing a source text; a source display
16 data memory unit for *storing a source display data, wherein the*
17 *source display data is a combination of source display properties*
18 *included in the source text and a location in which source display*
19 *properties are attached to the source text*; a conversion unit for
20 converting a source text body into a target text body, the source text
21 body being text in which source display properties are excluded; the
22 target text also being text in which display properties are excluded; *a*
23 *target text memory unit for storing the converted target text body;*
24 *conversion paired information memory unit for storing conversion*
25 *paired information, wherein the conversion paired information is a*
combination showing how the words in the source text correspond
to the words in target text, wherein word is defined as a unit with
meaning; a process unit for processing the target text body and
preparing a target display data by searching the source display data
and the conversion paired information, wherein the *target display*
data is data showing target display properties to be attached and a
location in the target text body to which should be attached target
display properties corresponding to the source display properties; a
target text preparation unit for preparing a target text by attaching
the display properties to the target text body stored in the target text
memory unit, the attaching carried out by conforming to the contents

1 of the target display data obtained from the process unit; and a
2 display unit for displaying the prepared target text."

3 (Sugimura, Column 2, Lines 15-44; emphasis added). Thus, Sugimura not
4 only shows, but is directed to, showing both original and translated text, not
5 replacing the original text with the translated text.

6 In fact, applicant submits that both Miike and Sugimura teach away
7 from what is recited in claim 53 as amended. Because both the cited
8 references maintain both the original and translated text, where
9 nontranslated text is not displayed in a line based entry area in at least one
10 continuous string of text wherein translated text replaces the original text,
11 applicant respectfully submits that the references teach away from the
12 invention recited in claim 53.

13 Thus, applicant submits that neither Miike nor Sugimura, alone or in
14 combination, teach nor suggest what is recited by claim 53. Thus, claim 53 is
15 patentable over the cited references. Furthermore, because claims 54-73 are
16 patentable for at least the same reasons as the independent claim from which they
17 depend, and because they add additional features to claim 53, applicant submits
18 that claims 54-73 also are patentable. Applicant requests that the rejection under
19 35 U.S.C. § 103 be withdrawn against claims 53-73.

20 For the reasons already discussed with respect to claims 53-73, applicant
21 also asserts that claims 74-85 and 87-88 also are patentable over the cited
22 reference. Thus, applicant requests that the rejection under 35 U.S.C. § 102 also
23 be withdrawn against claims 74-85 and 87-88.
24
25

CONCLUSION

All pending claims 53-85 and 87-88 are in condition for allowance. Applicant respectfully requests prompt allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, the Examiner is requested to contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

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